Example ATV Certification Application

EPA Workshop March 9, 2005 Example presented by Polaris Industries Inc. Presenters: Larry Keller & Alex Kennedy

Example ATV Certification Application

Elements of a complete application:

- Model Year Letter of Intent
- Engine Family Application Letter
- Certification Summary Information (CSI)
- Nonroad Fee Filing Form
- Self Checklist (to be developed in near future by EPA)
- Samples of Vehicle Emissions Control Information (VECI) labels and hangtags
- ABT-related information including PLT
- MY06 only: any phase-in calculations

Example ATV Certification Application Model Year Letter of Intent

Purpose:

- 1. outline model year plan and schedule
- convey information common to all engine family applications (e.g., VIN coding system, engine family naming convention)

Benefits to OEM:

- 1. forces model year planning
- 2. simplifies individual applications
- 3. expedites approvals
- * The letter of intent is the preferred method to convey common information. Small manufacturers with one or two families may find it more convenient to include this information in individual application.

Example ATV Certification Application Model Year Letter of Intent

Suggested Content:

- Company letter head
- Company contact information
- VIN, model number, and engine family naming conventions (coding system)
- Application and desired certificate schedule
- Warranty statements
- Assembly and Testing Facilities description
- Procedures description
- Sample VECI label and hangtag content and format
- Requests for approval prior to applications
- Other pertinent general information
- Authorized company representative signature

Example ATV Certification Application

Polaris example: 6POLX.6834CA

 MY2006 Polaris engine family containing ATV's having 0.683L displacement, 4stroke, carbureted engines.



Example ATV Certification Application Engine Family Application Letter

Elements of application letter:

- Company letter head
- Request certification of engine family and communicate desired time frame
- Relay engine family detail not included in letter of intent
- Update any family specific information from letter of intent
- Include required compliance statements
- Explanation of engine configuration coding
- Reference all elements of complete application (i.e. any approvals from ARB/EPA)
- Authorized company representative signature

^{**} This type of letter is a required supplement to the CSI.

Conveys:

- Engine family parameters
- 2. Certification levels
- 3. Test data
- 4. Models covered

CSI.1 General Information (Model Year: 2006)												
US Manufacturer/US Importer:			Parent Company Name, if applicable:					Small N	Small MFR Recognition:			
Polaris Industries Inc.			CARB	MFR Code	, if any:			CARB:	CARB: □SVM			
Engine Family Name:	AB	T Engine	Family:	Applica	dion Type:	!			EPA:	□SVM	■ USVM	
6POLX.6834CA		EPA Only CARB O	y nly □ Both		New ☐ Correction ☐ Running Change ☐ Certify by Design: ☐ Yes ☐ No ☐ Carry Over, from EF: 5POLX6834CA							
Evaporative/Permeation	Family	Name (s)):	Sales A	reas (of all	vehicles i	n the engine t	family):	If your	are not the C	EM of the vehicle or	
									engine t	o be certified, j	please indicate :	
				⊠ 50 S	tadnes 🔲	49 States	Califo	onia Only	r			
Vehicle/Engine Category					tades + Cal				Name of	Name of Vehicle OEM: Polaris		
					tades + .Cal					Country: USA		
■ ATV.A ■ ATV.B					tades + 49 !	- —			Name of	Name of Engine OEM: Polaris		
☐ UTV ☐ ENG	шс	ARB.NC		<u>□ 50 S</u>	tades + 49 :	Stades + .C	alifornia		Country: USA			
Applicant Comment	ts: Eng	ine-b as	ed certific:	ation pe	r 40 CF	R 1051.J	l 45, direct	to stand	lard – no A	ABT/FEL. I	Data carryover	
from CARB MY05	certific	ation (£	POLX.683	34CA).	Carry-	over dat	a not used	to gene	rate ABT (credits.	<u> </u>	
CSI.2: EPA/CARB E	missio	n Stand	lards and (Certific:	ation Lev	vels	(CAR	в нис	Early Co	mpliance M	(ultiplier:)	
									Perme	ation HC	Vehicle Evaporative	
	EPA Exhaust Emissio				C.	ARB Exha	aust Emission	ks		ssions	Emissions	
(units: □g/km; ⊠g/kw			-hr)	(un	its:□g/k	ու; ⊠g/հհգ-հ	ur)	(Unit (g/m²/day)	(Unit: g/test)		
									(EPA	(only)	(HMC CARB-only)	
Air Pollutant	нс	NOx	HC+NO _X	co	нс	NOx	HC+NO _X	co	Fuel Tank	Fuel Hoses	Diurnal + Hot Soak	
Cartification Level			82	248			61	195				

10.0

300

13.4

400

Emission Standard

Family Emission Limit

CSI 3 Engine Family Description

Fuel System (see CSI4) carburetor	Number of Cylinders: 2 Valves per Cylinder: 2							
caroment	Fuel Type: ☑ Gasoline ☐ LPG ☐ NG ☐ Other:							
Engine Type: 🗵 Recip rocating 🗆 Rotary 🗖 Turbine 🔲 Other:	Engine Cooling Media: 🔲 Air 🗵 Liquid 🔲 Other:							
Combustion Cycle: 🗵 4-Stroke 🔲 2-Stroke 🔲 Other:	Exhaust Useful Life (years): 5							
Cylinder Arrangement: ☑ Inline ☐ Vee ☐ Flat ☐ Other:	Exhaust Useful Life (hours): 1,000 Exhaust Useful Life (distance): 10,000 Unit: 🗵 km 🔲 mile							
New Technology: ☑ No ☐ Yes, technology explanation:								
CSI.4: Exhaust Emission Control Information (use SAE J1930 technology abbreviations)								
Catalytic Converter: 🛛 No 🔠 Yes: Number of catalytic converter (s):								
Catalyst Configuration:	` '							
Catalyst Type: ☐ Oxid: Exhaust Cas Recirculation (EGR): ☑ No ☐ Yes: EGR Type:	ariion (OC) Three-way (TWC)							
Exhaust Gas recirculation (EGR): 12 No 12 Tes: EGR Type:								
Electronic Controls: ECM ICM Other:								
Feedback Sensor: 🛛 No 🔲 Yes: Number of oxygen sensor (s):								
Sensor Configuration:								
Sensor Type:	☐ HO2s ☐ AFS							
Air Injection: PAIR AIR Other:								
Fuel System:								
🖾 Carburetor 🔲 Gaseous Carburetor 🖾 Carburetor: N	umber of Carburetors: 1 Barnels per Carburetor: 1							
Method of Air Aspiration: ☐ Natural ☐ SC ☐ TC ☐ SAA ☐ TAA	□ SAW □ TAW □ Other							

CSI 5: Exhaust Emission Data Vehicle/Engine and Test Data													
EDV ID (or VI EDV Type:			Displac	ement (cc): 68	3	N/V Rat	io:		EIM (kg):				
☑ Carryover, from EF:			1	Power @ rpm: @ 6000		Configuration: 001			Tire Pressur	e:			
5POLX.6834C/ Model Name:	_	018	Transn	nission: CVT		Curb Mass:			Road Load l	Horsepower:			
Assigned DF:	⊠ N/A □ EP	A SVN	I 🔲 ARI	B SVM 🔲 50-	State SVI	I Test	Procedure:	Chassis	s 🗵 Engine	(Л088) 🔲 Оф	er:		
Test Date Test "E"		"A"-,	tBy Testfor -EPA "C"-Cert 'ARB "R"-RC		Test Fuel "I"-Indolene, "P"-CA Phase 2		Tested at	Ľ.	Raw Emission Test Results (Note: Unit should be the same as the emission standards for the EF)				
			MFR		O Other		☐ hr	HC		HC + NOx	co	CO ₂	
3/6/03	1		м о			1	0	32	33	65	127.5		
3/17/03	2	M		0	0		2500	2.4	3.7	6.1	1133		
3/26/03	3	M		0		I	5000	35	3.5	7.0	108.0		
4/8/03	4	м		0		I	7500	2.4	38	62	1023		
4/17/03	5	М		0	I		10000	2.4	4.4	68	94.0		
6/19/03	1		M	С	I		0	23	33	5.6	185.1		
For EPA Certification EPA Deterioration Factor (Additive Multiplicative)													
(50 States and 49 State) EPA Certification level						tification level			82	248			
For ARB Certification CARB Deterioration Factor (Multiplicative Only)								1.049	1.00				
(50 State or CA only) CARB Certification level								6.1	185				
DDV Information, if different that EDV: DDV SN 00012, EDV SN 00025. DDV and EDV from same tooling. EDV is final calibration.													
Manufacturer Comments: Pollutants measurements displayed in g/lp-hr, except for EPA certification levels, which are shown in g/kW-hr. Engine-based testing equivalency to useful life in kilometers defined by CARB-approved DF test procedure; reference CRC-2002-002.													

CSI.6A: Permeation Emissions Control/Test Data (Optional until 2008 MY)

Certify by Er	nission Testing	3								
Equipment	Material	Thickness (mm)	Total Inside Area (m²)	Test Data (g/m²/day) Evap/Perm Test Carryover, from: MY: EF:	DF (g/m²/day) New EPA DF for SVM Carryover, from: MY: EF:	Certification Level (g/m²/day)				
Fuel Tank										
Fuel line										
Certify-by-D	Certify-by-Design									
Fuel Tank										
Fuel line Fuel lines permeability control technology applied is 40 CFR §1051 245, Table 2, control technology: (i) (ii) Other:										
Manufacture	r Comments :									

CSI.6B: Evaporative Emissions Control/Test Data (Highway Motorcycle - CARB-only)

	Vehicle Evaporative Emissions Information									
Evaporative Emission Test Vehicle Information			Evaporative Testing Result (raw data: g/test)			Evaporative Deterioration Factors (Additive Factors)			Certification LEVEL (g/test)	
Evaporative Family	Test Vehicle ID Number	Test Date	Test Type*	Diumal	Hot Soak	Diumal + Hot Soak	Vehicle DF	Bench DF	Overall DF: (vehicle + bench)/2	={(Diumal+Hot Soak) + Overall DF}
Manufacturer	Manufacture r Notes:									

^{*} Test Type: evaporative emission data vehicle (EDV), or vehicle DF emission data vehicle (VDV) or bench emission DF data vehicle (BDF)

CSI.7: Models Covered

	Vehicle/Engine Models Covered						
Make (Marketing Division)	Polaris	Polaris					
Model Name	Sportsman 700	Sportsman MV					
Engine Code	EH0680LE018	EH0680LE017					
Vehicle Category	ATV	ATV					
Bore (mm)	80	80					
Displacement ☐ Liter ☐ cm ³	683	683					
Rated Power (kW)	32	32					
RPM @ Rated Power	6000	6000					
Rated Torque (nt-m)	54	54					
RPM @ Rated Torque	5000	5000					
Un-governed Rated Speed (rpm)	6000	6000					
Curb Mass (kg)	347	450					
Transmission (MS, A3, etc.)	ΑV	AV					
Label Type ¹	2	2					
Emission Control System (model / rating specific)	EM	EM					
Projected Sales (CBI) - CA Only	200	100					
Projected Sales (CBI) – US Total (Includes CA Sales)	20,000	10,000					

CARB ONLY: California ATV Specification (Category ATV.A) (Use Yes or No to answer.)							
Vehicle Characteristics	Sportsman 700	Sportsman MV					
50 " or Less in Width?	Yes	Yes					
4 Low Pressure Tires?	Yes	Yes					
Seat Straddled by Operator?	Yes	Yes					
Without Passenger Seating?	Yes	Yes					
Handlebar?	Yes	Yes					
Max Payload 350 lbs?	Yes	No					
(CARB Staff Only)							
California ATV? (Y/N)							
Staff Notes							

Example ATV Certification Application US EPA Air Index Consumer Hangtag

Polaris Industries Inc. Consumer Emissions Information Hang Tag

Vehicle Type:

All Terrain Vehicle

Vehicle Model Name(s): Sportsman 700, Sportsman MV

Engine Description:

683 cc 4-stroke, Liquid-cooled, carbureted

NER: 5

0 2 4 6 8 10

Most Clean Least Clean

The normalized emission rate is defined by the U.S. Environmental Protection Agency in 40 CFR 1051.135(g). Values Range from 0 to 10, with 0 representing lower exhaust emissions and 10 representing higher exhaust emissions.

This hang tag may only be removed by the ultimate consumer after the vehicle has been purchased.

Example ATV Certification Application Vehicle Emission Control Information

Label located on vehicle per 40 CFR 1051.135

Example for EPA & CARB compliant 6POLX.6834CA



EMISSION CONTROL INFORMATION 6POLX.6834CA

 \mathbf{EM}

U.S. EPA IMPORT FORM 3520-21 rev 2-01 CODE 16

THIS VEHICLE MEETS U.S. EPA REGULATIONS FOR 2006 ATV'S OR OFFROAD UTILITY VEHICLES AND IS CERTIFIED FOR SALE IN CALIFORNIA AND ALL 50 STATES.

APPLICABLE EMISSIONS LIMITS: HC+NOX 13.4 G/KW-HR; CO 400 G/KW-HR

THIS VEHICLE IS CERTIFIED TO OPERATE ON GASOLINE. RECOMMENDED FUEL: UNLEADED GASOLINE, MINIMUM OF 87-OCTANE (R+M)/2.

OIL: POLARIS 0W-40 SPARK PLUG & GAP: Champion RC748 YC; 0.35" (0.9mm) IDLE SPEED: 1200 ± 100 RPM

NO ADJUSTMENTS NECESSARY. SEE OWNER'S MANUAL FOR MAINTENANCE DETAILS.

PN 7173575

Example ATV Certification Application Vehicle Emission Control Information

Label located on vehicle per 40 CFR 1051.135

Example for manufacturer exempt



EMISSION CONTROL INFORMATION

U.S. EPA IMPORT FORM 3520-21 rev 2-01 CODE 3

THIS ENGINE IS EXEMPT FROM THE EMISSIONS STANDARDS AND RELATED REQUIREMENTS OF 40 CFR 1051 AS PROVIDED IN 40 CFR 1068.215. INSTALLING THIS ENGINE IN ANY VEHICLE NOT OWNED BY POLARIS MAY BE A VIOLATION OF FEDERAL LAW SUBJECT TO CIVIL PENALTY.

MANUFACTURER-OWNED EXEMPTION. THIS ENGINE IS NOT FOR SALE BY POLARIS.

QUESTIONS: CALL POLARIS REGULATORY COMPLIANCE AT 1-800-POLARIS.

PN 3089730

Example ATV Certification Application Off-road fee filing form

Can be downloaded from EPA website:

http://www.epa.gov/otaq/ nr2feeform.pdf

Send form and payment to bank indicated on form.

Send copy of form to certification officer as part of engine family application package.

\$826 per engine family

EDA MURCO Horxoad Fee Filing Form EDA Form#:1520-29 OMB NO.2860-0545							
GEPA U.S. ENVIRONMENTAL PROPERTION AGENCY NOTOR VEHICLE AND ENGINE COMPLIANCE PROGRAM ROMBORD FEE FILLING FORM							
Applicant's Coxporate Name Polaris Industries Inc.							
Address 2100 Highway 55							
City/State/Zip Code/Country Medina, MN 55340							
Monroad Cartification Request Type (check one)							
NR C1**(\$1,822)Locomotives *(\$826)							
NR SI *(5826) Recreational *(except marine) (\$826)							
All Marine * (excluding Sl inbourd/staradrive) (\$826)							
* Includes ICIs * excludes Locceptives, Marine and Recreational Vehicles							
EPA standard engine family or test group name: 6 POLX.6834CA							
(Make checke payable to: "U.S. ENVIRONMENTAL PROTECTION AGENTY") Stater the check number, or the statement "EFT/WIRE" or "EFT/ACH": Indicate in the EFT passage field: Mirs: Location Codes "ES0120021", "EFA MYECP Fea", ARA* "02103004" ACM: EDFI-08 BANK: Routing Transit* "081200210", Account 1: 1001091030, Account Nume: EPA (Tholiude in field: engine family/test group name, corporate mass, and MYECP Fees)							
Reduced Fee Section							
Is the reduced fee calculation as described in 40 CFR 85.2406 (minimum payment \$750) attached?							
Hasher of vehicles/angines projected for sale under this engine family/test group? If an Independent Commercial Importer (ICI), list the VIM of imported vehicles/angines below:							
Company Representative: Alexander A. Kennedy signature: Negalic A. Konnedy							
TILLE: Fredrit Compliance shome/PAX. (218)463-4575 / (618)463-4580 Date: 12/17/04							
Current E-Mail Address: Product, Compliance & Polaris Ind . com. Addresses: Send checks and all Fee Filing Forms for checks, wires and ACE payments by sail to:							
Invironmental Protection Agency Notor Vehicle and Engine Compliance Program P.O. Box 854472 St. Louis, NO 6115-4472							
dee instruction page for sending checks and forms by private mail service (e.g., Federal Express). Transsis ETT/ALTS payments to the bee york Federal Buserva Bank. Transsis ETT/ACS to the UR halb.							
Carrent Form Expires: 3/1/06							

Example ATV Certification Application Self Checklist

Future form. Not finalized at this point.

Obtain from certification officer.

Send to certification officer as part of engine family application package.

Special Topic 1: ATV Engine Import

- Many ATV's use imported engines from non-US suppliers
- Multiple hardware configurations and import situations exist
- The attached chart shows examples of how the revised Form 3520-21 can be completed for some common situations
- The Description & Declaration section may require attached listings in some cases

EPA Form 3520-21 Examples for ATV

Imported Item	As-Imported Assembly Description	To Be Installed by ATV Manufacturer	Form 3520-21 Engine / Vehicle / Equipment Type	Form 3520-21 Import Code
ATV Engine Assembly "A" Certified Vehicle Configuration	Engine Block Cylinder Heads Crankcase & Pistons Fuel System (Carburetor) Vehicle ECI Label [optional]	Air Box Exhaust System ATV Chassis	Box F. Recreational spark ignition vehicles or engines	Box16. Incomplete Engines
ATV Engine Assembly "A" Prototype Configuration	Engine Block Cylinder Heads Crankcase & Pistons Fuel System (Carburetor) Exempt Engine Label [optional]	Air Box Exhaust System ATV Chassis	Box F. Recreational spark ignition vehicles or engines	Box 3. Manufacturer-Owned Engine
ATV Engine Assembly "B" Certified Vehicle Configuration	Engine Block Cylinder Heads Crankcase & Pistons Fuel Injectors w/o EMM Vehicle ECI Label [optional]	Air Box Exhaust System Engine Mgmt Module ATV Chassis	Box F. Recreational spark ignition vehicles or engines	Box16. Incomplete Engines
ATV Vehicle Certified Vehicle Configuration	Complete ATV Vehicle ECI Label [optional]	N/A	Box F. Recreational spark ignition vehicles or engines	Box 1. U.S. Certified Engine or Engine Installed in a Certified Vehicle
ATV Vehicle Prototype Vehicle Configuration	Complete ATV Exempt Engine Label [optional]	N/A	Box F. Recreational spark ignition vehicles or engines	Box 3. Manufacturer-Owned Engine

Import form can be found at http://www.epa.gov/otaq/imports/

Special Topic 2: ATV Engine Testing

- Emission testing for the example US engine family conducted at the Polaris facility in Roseau, MN
- Engine-based testing using the J-1088 raw gas testing option that is allowed through model year 2008
 - engine dynamometer (i.e. Schenck W130 water cooled eddy current dyno)
 - Raw gas heated sample emissions bench (i.e. Pierburg AMA 4000)
- Carry-over of certification and DF data from previous CARB executive order
 - Certification engine tested after stabilization
 - Service accumulation to 10,000 km vehicle-equivalent distance using an aggressive engine test cycle
 - DF calculated using least squares fit of stabilized, intermediate, and end of useful life data (at least 3 equally spaced points per CARB)
- Test fuels
 - Locally available gasoline used for service accumulation
 - Indolene Clear (EEE) used for emissions testing

ATV Test Engine on Polaris Dyno



ATV Engine on Dynamometer



Operator Work Station



Emissions Bench

ATV-Specific Engine Test Development

- EPA and MIC have an MOU re: development of an engine-based test cycle to replace the J-1088 option
- SWRI has been contracted to conduct the associated field and engine testing
- Field testing of instrumented vehicles is complete
- Engine testing phase is nearing completion
- MIC will be propose an engine-based, ATV-specific test cycle for review by the EPA
- Ultimately the new engine-based test and g/kW-hr emission limits functionally equivalent to the FTP chassis dyno limits will be adopted by the EPA as a certification option
- The FTP-75 Chassis dyno limits (g/km) will remain as the base standards in the rule

Questions and Answers

- Q1 How will EPA reconcile the differences in DF direction between CARB and EPA?
- A1 EPA has no plan to change DF definition as it is written in 40CFR§1051. However, the technical amendment to be published in a near future will clarify further on how to calculate and apply a DF for a regulated pollutant to demonstrate compliance.
- Q2 Please explain the 50-state, 49-state, CA designations in the General Information Section of the application
- A2 A 50-state designation indicates that the vehicle has been certified to meet both EPA and California regulations and can be sold in all 50 states; it bears a 50-state label with wordings to the effect that it meets both EPA and California regulations. A 49-state designation indicates that the vehicle has been certified to meet EPA regulations and can be sold only in federal sales area (currently 49 states); its label wordings do not make reference to compliance with California regulations. A California designation indicates that the vehicle has been certified to meet California regulations and can be sold in California and those states which have adopted California requirements for motorcycles or ATVs (currently none have adopted California requirements for motorcycles and ATVs); its label does not make reference to compliance with EPA regulations, and when it does, the reference is for compliance with EPA regulations as applied to California, for example, a California-designation off-road motorcycle that does not meet EPA's permeation requirement.

For the General Information Section, the question is about ALL available label types that are used for the vehicles in an engine family. If vehicles in an engine family have only the 50-state label, the 50-state box should be marked. If vehicles in an engine family have either a 50-state and 49-state label, then the 50-state + 49-state box should be marked. If vehicles in an engine family have either a 50-state, 49-state, or California label, then the 50-state + 49-state + California box should be marked.

Questions and Answers

- Q3 Is curb mass, EIM, tire pressure, NV ratio, road load horsepower necessary on the CSI for engine-based certification?
- A3 You may leave these fields blank if you use engine based tests to show compliance.
- Q4 What is EPA's policy on carryover of California certified families?
- A4 Before 2009 MY, EPA in general will not require any new emissions data if you carryover California certified emissions data to show compliance with the optional (engine-based) emission standards set forth in §1051.145 (b).
 - A new section §1051.145 (b)(5) will be added to the Technical Amendment to be published soon that provides "For engines certified under this paragraph (b) without generating or using emission credits under subpart H of this part, you may determine deterioration factors based on emission measurements using good engineering judgment, instead of following the provisions of §1051.243." This paragraph will be limited to 2006 to 2008 model year engine families.
- Q5 what entails an "incomplete" engine versus a "complete" engine for the purpose of the engine importation form?
 - A5 For ATV certification which is a vehicle-based certification, if the engine is not installed in a vehicle representing its certified form, it is an "incomplete" engine for the purpose of the importation form.

Questions and Answers

- Q6 What is the meaning of the term "new technology" on CSI.3?
- A6 <u>New technology</u> refers to an advanced technology that is the first time applied to your certifying vehicles or engines and that has potential impact to emissions, even if the same technology may have been used by other manufacturers.
- Q7 Where is the term "rated power" as used in CSI.5 and CSI.7 defined in the regulation?
- A7 <u>Rated power</u> means the *maximum engine power* as defined in 40 CFR 90.3
- Q8 What is the difference between DDV and EDV on CSI.5?
- A8 A <u>DDV (durability data vehicle)</u> is a vehicle or engine that is tested to establish deterioration factors (DFs). An <u>EDV (emission data vehicle)</u> is a vehicle or engine that is tested to show compliance with applicable emission standards for certification purpose. Under the requirements for highway motorcycles, off-highway motorcycles and ATVs, manufacturers are allowed to perform emissions tests on the same vehicle to generate DFs and demonstrate emissions compliance; therefore, In this case, an EDV may include or equal to a DDV. (Ref: 40CFR§1051.801)
- Q9 What does the term "configuration" mean in CSI.5 ?
- A9 <u>Configuration</u> means a unique combination of vehicle (or engine) hardware and calibration within an engine family. Engines within a single vehicle (or engine) configuration differ only with respect to normal production variability. (Ref: 40CFR§1051.801: Engine configuration)